

# EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**STATE DEFENDANTS' PROPOSED DETAILED WITNESS LIST**

Pursuant to the Court's Order [Doc. 1700] setting a pretrial schedule for the parties to complete their trial preparations, State Defendants identify below the witnesses whom they *may* call at trial and the anticipated subject of their testimony. Because the Court has not ruled on State Defendants' Motions for Summary Judgment [Docs. 1567, 1568], State Defendants' witness list provided herein is subject to change. State Defendants reserve the right to modify or supplement this list of witnesses based on further discovery of information, the pretrial proceedings in this lawsuit, and resolution of their motions for summary judgment. State Defendants further reserve the right to supplement this list with reasonable notice to counsel.

<b>Proposed Witness</b>	<b>Anticipated Subjects of Testimony</b>
Dr. Ben Adida	Audits; rebuttal expert testimony
James Barnes	Coffee County elections administration
Michael Barnes	Georgia election system and security; implementation of updates to Dominion BMD system; the BMD voting experience
Merritt Beaver	IT security; Fortalice assessments
Matthew Bernhard	BMDs and election security
Nancy Boren	Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; audits; implementation of the relief Plaintiffs seek
Christopher Brill	DRE analysis for CGG and claims of voting irregularities
Eric Chaney (or Coffee County Elections Board Representative)	Coffee County
Coalition for Good Governance Corporate Representative	Allegations, claims, and relief sought in this action
Jack Cobb	Voting system certification; review of voting equipment
Dr. Eric Coomer	Dominion BMD voting system and election security
Benjamin Cotton	Coffee County and work with VoterGA
Alex Cruce	Coffee County; ballot secrecy; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks
Donna Curling	Allegations, claims, and relief sought in this action
Ricardo Davis	Allegations, claims, and relief sought in this action
Laura Digges	Allegations, claims, and relief sought in this action
William Digges III	Allegations, claims, and relief sought in this action
Dominion Corporate Representative	Dominion BMD voting system security; Dominion Democracy Suite version 5.17

Jennifer Doran	Elections Administration; Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; audits; implementation of the relief Plaintiffs seek
James Elliot	Municipal election administration in Georgia
Joseph Blake Evans	Secretary of State election administration issues; recommended layout of voting machines; implementation of relief.
Ryan Germany	Ballot secrecy; election administration issues
Dr. Juan Gilbert	Election security; BMD voting systems; HMPBs; audits; rebuttal expert testimony
Derrick Gilstrap	Fulton County elections administration; balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; implementation of the relief Plaintiffs seek
Taran Greenwald	DRE investigation and analysis for Coalition for Good Governance
Scott Hall	Coffee County; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks
David Hamilton	Secretary of State IT and cybersecurity issues
Misty Hampton	Coffee County
Chris Harvey	Ballot secrecy; recommended layout of voting machines; election administration
Joseph Kirk	Elections Administration; Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; audits; implementation of the relief Plaintiffs seek
Chris Krebs	Former Cybersecurity and Infrastructure Security Agency director; election security issues
Cathleen Latham	Coffee County
Lynn Ledford	County elections administration; balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; implementation of the relief Plaintiffs seek
Jeffrey Lenberg	Coffee County

Doug Logan	Coffee County
Marilyn Marks	Allegations, claims, and relief sought in this action; Coffee County
Matthew Mashburn	SEB regulations regarding election security and handling of equipment; SEB authority
Christy McCormick	U.S. Election Assistance Commission; voting machine certification and review
Charlene McGowan	Ballot secrecy
Megan Missett	Allegations, claims, and relief sought in this action
James Oliver	Former Security Manager at Secretary of State; cybersecurity issues
Donald Palmer	U.S. Election Assistance Commission; voting machine certification and review
Theresa Payton	IT and cyber security
James Persinger	IT and cyber security; Coffee County equipment
Sidney Powell	Coffee County
Donna Price	Allegations, claims, and relief sought in this action
Jil Ridlehoover	Coffee County
Jeffrey Schoenberg	Allegations, claims, and relief sought in this action
Representative(s) of the Office of the Secretary of State of the State of Georgia	To the extent not encompassed by anticipated testimony from other current and former SOS employees specifically designated herein and regarding matters put at issue in Plaintiffs' case
Dr. Michael Shamos	Hand marked paper ballots
Robert Sinners	Coffee County; 2020 post-election efforts to investigate security and accuracy of Georgia election system
Gabriel Sterling	Allegations and relief sought in this action; audits; procurement and implementation of Dominion BMD system and updates to the Georgia voting system; physical; CISA; Ballot secrecy; recommended layout of voting machines; implementation of Plaintiffs' requested relief
Blake Voyles	Coffee County